

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS-----X
CARINE M. VOLNY,

Plaintiff,

- against -

GRM TRANSPORT LIMITED LIABILITY
COMPANY and R. GYOKHAN MUSTAFA,Defendants.
-----X**To the above-named Defendants:**

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorneys within twenty (20) days of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

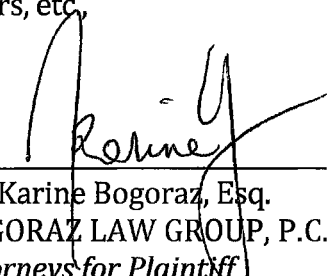
Dated: November 23, 2020
Brooklyn, N.Y.**SUMMONS**

Index No.

Date Purchased:

Plaintiff designates KINGS
County as place of trial.Basis of venue: CPLR § 503(a).
Plaintiff resides at:
618 East 21st Street, Apt. # C1
Brooklyn, N.Y. 11226

Yours, etc.


BY: Karine Bogoraz, Esq.
BOGORAZ LAW GROUP, P.C.
Attorneys for Plaintiff
3820 Nostrand Avenue, Suite 106
Brooklyn, N.Y. 11235
(646) 809-1616
Our File #: 19-2645

To: GRM TRANSPORT LIMITED LIABILITY COMPANY
c/o Gyokhan R. Mustafa
50 Anderson Avenue, Unit 2
Wallington, N.J. 07057

R. GYOKHAN MUSTAFA
558 Sollas Ct.
Lyndhurst, N.J. 07071

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X

Index No.

CARINE M. VOLNY,

Plaintiff,

COMPLAINT

- against -

GRM TRANSPORT LIMITED LIABILITY
COMPANY and R. GYOKHAN MUSTAFA,

Defendants.

-----X

Plaintiff, CARINE M. VOLNY, by her attorneys, BOGORAZ LAW GROUP, P.C.,
complaining of the Defendants herein named, respectfully complains to this Court and
alleges as follows:

1. At all times hereinafter mentioned, the Plaintiff, CARINE M. VOLNY, is a
resident of the County of Kings, City and State of New York.

2. At all times hereinafter mentioned, the Defendant, GRM TRANSPORT LIMITED
LIABILITY COMPANY (hereinafter, "GRM"), was, and still is, a limited liability company duly
organized and existing under the laws of the State of New Jersey.

3. At all times hereinafter mentioned, the Defendant, R. GYOKHAN MUSTAFA
(hereinafter, "MUSTAFA"), was, and still is, a resident of the County of Bergen, State of New
Jersey.

4. That on or about June 3, 2019, Defendant GRM was the registered owner of a
2010 International tractor truck bearing New Jersey State license plate number 'TNJ58T.'

5. That on or about June 3, 2019, Defendant GRM managed, maintained, and
controlled the 2010 International tractor truck bearing New Jersey State license plate
number 'TNJ58T.'

6. That on or about June 3, 2019, Defendant GRM supervised the 2010 International tractor truck bearing New Jersey State license plate number 'TNJ58T.'

7. That on or about June 3, 2019, Defendant MUSTAFA was the operator of a 2010 International tractor truck bearing New Jersey State license plate number 'TNJ58T.'

8. That on or about June 3, 2019, Defendant MUSTAFA was the operator of a 2010 International tractor truck bearing New Jersey State license plate number 'TNJ58T,' with the permission and consent of the Defendant GRM.

9. That on or about June 3, 2019, Defendant MUSTAFA was the operator of a 2010 International tractor truck bearing New Jersey State license plate number 'TNJ58T,' with the permission and consent of the Defendant GRM, while in the course of his employment for the Defendant GRM.

10. That on or about June 3, 2019, Plaintiff, CARINE M. VOLNY, was the operator of a 2008 NISSAN motor vehicle bearing Pennsylvania State license plate number 'KHE3215.'

11. On or about June 3, 2019, and at all other times herein mentioned, the streets and roads in the area of Linden Boulevard at or near its intersection with Bedford Avenue, in the County of Kings, City and State of New York, were, and still are, public roads, highways, and thoroughfare, available for public use and public travel.

12. That on or about June 3, 2019, Defendant MUSTAFA was operating the 2010 International tractor truck bearing New Jersey State plate number "TNJ58T" on Linden Boulevard at or near its intersection with Bedford Avenue, in the County of Kings, City and State of New York.

13. That on or about June 3, 2019, Plaintiff, CARINE M. VOLNY, was operating the 2008 NISSAN motor vehicle bearing Pennsylvania State license plate number 'KHE3215' on

Linden Boulevard at or near its intersection with Bedford Avenue, in the County of Kings, City and State of New York.

14. On or about June 3, 2019, the 2010 International tractor truck bearing New Jersey State plate number 'TNJ58T,' owned by Defendant GRM and operated by Defendant MUSTAFA, came into contact with the 2008 NISSAN motor vehicle bearing Pennsylvania State license plate number 'KHE3215,' operated by Plaintiff, CARINE M. VOLNY, on Linden Boulevard at or near its intersection with Bedford Avenue, in the County of Kings, City and State of New York.

15. That said car accident was due solely and wholly to the negligence, carelessness, and/or recklessness, of the Defendants, in their ownership, operation, maintenance, management, leasing, and/or control of said motor vehicle, all without any fault, nor negligence, nor assumption of risk, nor lack of care, nor of any other culpable conduct on this Plaintiff contributing thereto.

16. That solely as a result of the foregoing motor vehicle accident, dated June 3, 2019, the Plaintiff, CARINE M. VOLNY, sustained severe and serious personal injuries, and has been caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief, some of these injuries are permanent and lasting in their nature. Plaintiff has been rendered sick, sore, lame, and disabled. Plaintiff has been incapacitated from pursuing his usual vocations and avocations; and will, in the future be required to seek, obtain, and undergo hospital care, potential surgical care, medical care, attention, and medical treatment, in an effort to be cured of these physical and mental injuries, and to expend, and become obligated to expend sums of money in connection with the treatment of these injuries.

17. Plaintiff, CARINE M. VOLNY, is qualified to bring this action under the New York State Insurance Law in that Plaintiff has sustained serious injuries, resulting in: significant disfigurement; a permanent loss of use of body organ, member, function, or system; a significant limitation of use of a body organ, member, function, or system; a permanent consequential limitation of use of a body organ, member, function, or system; and, in addition, has sustained other injuries, which may be of a non-permanent nature, but which have prevented Plaintiff from performing substantially all of plaintiff's usual and customary activities for a period of at least 90 days out of the first 180 days following the above-mentioned motor vehicle accident.

18. That Defendant GRM did negligently entrust the 2010 International tractor truck bearing New Jersey State plate number TNJ58T, by failing to research, and/or by inadequately researching, driver qualifications, or the driving ability, or the driver's capacity for operating that type of motor vehicle used.

19. That Defendant GRM was negligent in maintaining and/or repairing the 2010 International tractor truck bearing New Jersey State plate number TNJ58T.

20. That Defendant GRM was negligent in its hiring, and retainment, of personnel who did not possess the skills and qualifications needed to rent or entrust the 2010 International tractor truck bearing New Jersey State plate number TNJ58T, to any consumer/employee/ or agent.

21. That Plaintiff, CARINE M. VOLNY, has sustained serious injuries as defined by § 5102(d) of the Insurance Law of the State of New York; and has suffered losses greater than the basic economic losses, as defined by § 5104 of the Insurance Law of the State of New York.

22. This legal action falls within one or more of the exceptions as set forth in C.P.L.R. § 1602 and Defendants are potentially liable for the full amount of any Judgment or Award herein made.

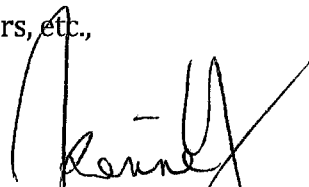
23. This Court has jurisdiction over all Defendants pursuant to New York Vehicle and Traffic Law Section 253.

24. By reason of the foregoing, Plaintiff has been damaged in the sum as encompassed by Statute and by law as set forth in C.P.L.R. § 3017, plus costs and disbursements of this matter, for all damages as encompassed by the statute and by the laws set forth under C.P.L.R. § 3017, with the provision that the amount of damages sought herein exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein.

WHEREFORE, Plaintiff, CARINE M. VOLNY, demands judgment against Defendants GRM and MUSTAFA, in the sum allowed under C.P.L.R. § 3017, together with interest, costs, and disbursements of this action.

Dated: November 23, 2020
Brooklyn, N.Y.

Yours, etc.,



BY: Karine Bogoraz, Esq.
BOGORAZ LAW GROUP, P.C.
Attorneys for Plaintiff
3820 Nostrand Avenue, Suite 106
Brooklyn, N.Y. 11235
(646) 809-1616
Our File #: 19-2645